

FILED - USDC - NH
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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

**Karen Testerman, *pro se*
Lynn-Diane Briggs, *pro se*
Wayne Paul Saya, Sr., *pro se***

Plaintiffs

Vs

**DAVID SCANLAN
SECRETARY OF STATE FOR NEW HAMPSHIRE, et al,
*Defendants***

Docket No. 23-cv-00499

DECLARATION OF LYNN-DIANE BRIGGS

**IN SUPPORT OF MY AMENDED MOTION FOR EXPEDITED CONSIDERATION
FOR PRELIMINARY INJUNCTIVE RELIEF**

I, Lynn-Diane Briggs, *pro se*, in the above-named action, hereby declare that I am a Plaintiff in the above-numbered action; that I reside at 4 Golden Pond Lane Amherst, New Hampshire 03031, and I hereby depose and offer the following declaration to the best of my knowledge and belief:

1. I have been an inhabitant and citizen in the town of Amherst, New Hampshire for about 34-years;
2. During a significant time-period of 34-years I owned and operated a small business dance studio, along with a non-profit 501c3 for the performing arts.

3. I was married to a Merrimack, NH—Boston, MA police officer (deceased) for 26-years, having three sons, one of which is a retired from the U.S. Marine Corp;
4. I am a disabled EMS Advanced 911 Responder;
5. And I am a patriotic Republican, with social media platforms which advance my constitutional ideals and values

Whereas:

6. From around 2005 until 2022, I worked as Karen Testerman's close advisor and confidant during her Senatorial and Gubernatorial campaigns.
7. During the Summer-time months, around the July, 2023 time-period, I was aware of talk and rumors regarding people being allowed to change party affiliations that was not in conformity with state law.
8. Because there was absolutely no formal discussions, comments, or GOP clarifications regarding this buzz circulating throughout voter circles, I was re-contacted by Plaintiff Karen Testerman who shared with me her attempts to address and correct, what she was led to believe, was a GOP bylaw issue as opposed to a state law issue.
9. In-turn, I learned that Plaintiff Karen Testerman was actively attempting to correct the issue of party affiliation changes, after she had learned that Defendant Chris Ager had a meeting with Defendant David Scanlan at the beginning of February of 2023, and again in August of 2023 with regard to party affiliation issues, which included the party affiliation cut-off date.

10. I was not aware of certain particular details other than GOP by-laws and resolutions were being attempted by Karen Testerman to resolve the closing of party affiliation changes.
11. Later, Plaintiff became aware of an "email" from the Secretary of state, David Scanlan, dated September 13th, 2023, to the cities and towns of New Hampshire, that included all supervisors EXHIBIT "A" when it was provided to Plaintiff, by Donna Judge, supervisor of the checklist for Hampstead, NH.
12. During this controversy, I had become more upset when on or around October 9th through the 11th, I read multiple news articles which were published that outlined how "newly" undeclared voters could interfere with the New Hampshire Republican Presidential Primary. "EXHIBIT C"
13. At this point in time I believed and now am of the belief that my vote-selection for the Presidential primary has become meaningless.
14. When I became aware of a letter dated October 6, 2023, authored by the Merrimack County GOP chairperson, Karen Testerman, that was sent to Defendant Chris Ager, See "EXHIBIT D", I realized there were major legal election implications involved, because a legal restraining order to enjoin the New Hampshire Secretary of State was requested by my friend and Merrimack county chair (Karen Testerman "Karen") for violating election laws that were directly related to my ability to change my party affiliation.
15. Karen has been a friend for decades, dating back to when her daughters were enrolled in my dance studio business.

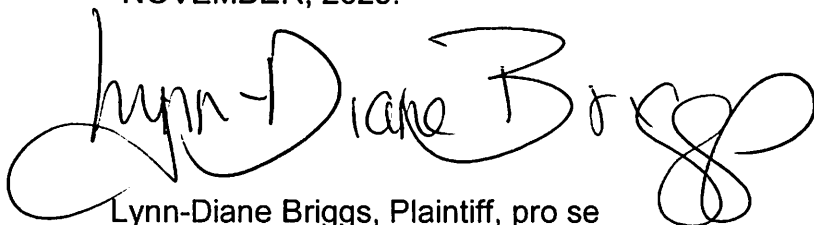
16. Karen was and continues to be an integral part of my recovery from a brutal assault, where to date I have experienced 15-surgies.

17. During this period in time, I was made aware that as the Merrimack County GOP chair, Karen was blatantly being ignored by Chris Ager, which also impacted my next door city of Merrimack, New Hampshire, when their annual Oktober-fest event was circumvented by Defendant Ager, where he appeared to have held an intentional last minute and simultaneous event in northern New Hampshire against Karen's GOP Merrimack Oktober-fest event. This last minute northern event caused major GOP state and national candidates to cancel "that morning" their confirmed appearances. To me, this appeared to be a targeted event against an extremely party-loyal professional and GOP leader.

18. I believe, when I have a state government that believes any election law can be broken without consequence for the sake of convenience or strategy, and my party chair participates in this law-breaking, my one vote becomes worthless.

19. Because my state government and my party chair have refused to provide relief to me and the GOP, I am now forced to seek help to fix what is now constitutionally broken before the upcoming Presidential primary of January 23rd, 2023.

SWORN TO UNDER PAINS AND PENALTIES OF PERJURY THIS 20TH DAY OF NOVEMBER, 2023.

A handwritten signature in black ink, reading "Lynn-Diane Briggs". The signature is fluid and cursive, with the first name "Lynn" and last name "Briggs" clearly legible.

Lynn-Diane Briggs, Plaintiff, pro se
4 Golden Pond Lane
Amherst, New Hampshire 03031

Lynbdance@gmail.com
603-801-6886

CERTIFICATE OF SERVICE

I, Lynn-Diane Briggs, *pro se*, have caused to deliver the named DECLARATION OF LYNN-DIANE BRIGGS IN SUPPORT OF MY AMENDED MOTION FOR EXPEDITED CONSIDERATION FOR PRELIMINARY INJUNCTIVE RELIEF, and the foregoing documents have been served upon the following Defendants and Plaintiffs, certified mail and U.S. postage pre-paid:

David Scanlan, Defendant
Secretary of State of New Hampshire
C/O: Brendan Avery O'Donnell
NH Department of Justice (Concord)
33 Capitol St
Concord, NH 03301
603-271-3650
Fax: 603-271-2110
Email: brendan.a.odonnell@doj.nh.gov

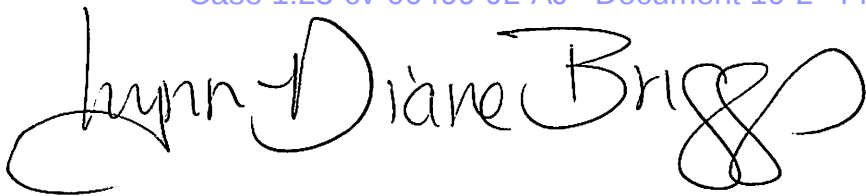
Chris Ager, Defendant
Chairman
New Hampshire Republican State Committee
10 Water St, Concord, New Hampshire 03301

And served upon the following Plaintiffs:

Karen Testerman, Plaintiff, *pro se*
9 Stone Avenue
Franklin, New Hampshire 03235
Karen@KarenTesterman.com
603-934-7111

Wayne Paul Saya, *pro se*
24 Cadogan Way
Nashua, New Hampshire 03062
waynesaya2@gmail.com
571-220-3344 mobile

SWORN TO UNDER PAINS AND PENALTIES OF PERJURY this 20th day of November, 2023.

A handwritten signature in black ink that reads "Lynn-Diane Briggs". The signature is fluid and cursive, with the first name "Lynn" and last name "Briggs" clearly legible.

Lynn-Diane Briggs, Plaintiff, pro se
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